EXHIBIT 1 TO ORDER

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

BAYOU STEEL BD HOLDINGS, LLC, et al., 1

Debtors.

GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., *et al.*,

Plaintiff,

VS.

RIVER PARISH CONTRACTORS, INC.,

Defendant.

Chapter 7

Case No. 19-12153 (KBO)

(Jointly Administered)

Adv. Proc. No. 21-50225 (KBO)

STIPULATION REGARDING APPOINTMENT OF MEDIATOR

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the "<u>Plaintiff</u>"), for the estates of the above-captioned debtors (the "<u>Debtors</u>") in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), by and through his undersigned counsel and defendant River Parish Contractors, Inc. (the "<u>Defendant</u>," and together with Plaintiff, the "<u>Parties</u>"), enter into this *Stipulation Regarding Appointment of Mediator* (the "<u>Stipulation</u>") and hereby stipulate and agree as follows:

- 1. Derek Abbott (if available) shall be appointed as the mediator (the "Mediator") in this adversary proceeding.
 - 2. The mediation shall be conducted in accordance with the Local Rules of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (5783).

Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and/or otherwise as may be agreed by the Parties and the Mediator. The Parties will select a date for commencement of the mediation.

Dated: August 4, 2021 PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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